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Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
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[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION TO LODGE  
MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-  
2 5(b), and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on  
3 February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon  
4 Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly  
5 situated (collectively, "Plaintiffs") hereby move this Court for leave to lodge certain documents  
6 under seal related to their motion to challenge Defendant's assertion of attorney-client privilege  
7 over one certain document.

8 Plaintiffs request leave to lodge three documents under seal. First, Plaintiffs seek leave to  
9 lodge under seal Exhibit 1 to the Declaration of Kevin E. Rayhill ("Rayhill Declaration"), which is  
10 an unredacted version of an email message with the bates number MMERSCH00066967 that  
11 Defendant has clawed back as privileged under the attorney-client privilege. This email message is  
12 the document that is at issue in Plaintiffs' motion to challenge. Second, Plaintiffs seek leave to  
13 lodge under seal Exhibit 2 of the Rayhill Declaration, which is an unredacted version of the draft  
14 Joint Status Report in which Plaintiffs identified MMERSCH00066967 as responsive and relevant  
15 to its claims in the Consolidated Amended Complaint (ECF No. 208). Third, Plaintiffs seek to  
16 redact any excerpts from, or specific descriptions of, these documents in their motion. Plaintiffs  
17 have filed all of these documents, in accordance with the Court's ECF system, with the instant  
18 motion.

19 Plaintiffs take no position concerning whether these materials should be sealed under the  
20 standards governing sealed records. As set forth in their motion, it is Plaintiffs' position that the  
21 challenged communication is not protected by the attorney-client privilege.

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1 Plaintiffs have filed redacted versions of these documents with the Court, and will serve un-  
2 redacted versions of these documents on Defendant.

3 DATED this 6th day of May, 2016

4 **JOSEPH SAVERI LAW FIRM, INC.**

5 By: /s/ Joseph R. Saveri

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May, 2016 a true and correct copy of  
**PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL** was served via the  
United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Kevin E. Rayhill